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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**PLAINTIFFS' REPORT ON THIRD
PARTY SUBPOENAS**

This Document Relates to:

ALL ACTIONS

Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

1 In accordance with the Court's Order Regarding Joint Administrative Motion for an Order
 2 Regarding the Parties' Submission of Discovery Disputes [Dkt. 562], Plaintiffs hereby make this
 3 Report concerning third party discovery. This Report (a) lists the objecting nonparties that have been
 4 served with subpoenas in which compliance is required outside of the Northern District of California,
 5 (b) specifies whether the contested subpoena is for a pretrial deposition and/or documents or other
 6 tangible things, and (c) indicates whether the nonparties consent to having the dispute transferred to
 7 the Northern District of California for adjudication or appeal. While not requested by the Court, this
 8 Report also identifies pending motions to transfer and compel.
 9

10 To date, Plaintiffs have been able to serve all but three subpoenas.¹ Plaintiffs offered extensions
 11 to May 31, 2024 to all subpoenaed entities that contacted Plaintiffs to request an extension; however,
 12 not all subpoenaed entities responded to Plaintiffs. On May 10, two days after the original date for
 13 compliance, Plaintiffs sent letters to each of the subpoenaed entities that failed to respond indicating
 14 that Plaintiffs planned to file motions to compel in the event the entities failed to respond by May 31.
 15 Several of these subpoenaed entities contacted Plaintiffs to request an extension and/or file objections,
 16 but Nexar, Inc. and the Rape Abuse and Incest National Network (RAINN) failed to do so. Plaintiffs
 17 filed motions to transfer and compel as to both entities.² After filing, RAINN electronically served
 18 objections on Plaintiffs.
 19

20 The following chart lists the district where compliance is required for each objecting entity
 21 outside of the Northern District of California, whether it has served objections, and whether consents
 22 to transfer of any disputes to the Northern District of California. If a subpoenaed entity did not respond
 23
 24

25 ¹ Plaintiffs have not been able to serve Chambers Conlon & Hartwell (compliance location:
 26 Washington, DC), RALIANCE (compliance location: Washington, DC), Tai Ginsberg & Associates
 27 (compliance location: Washington, DC).

28 ² The motion concerning Nexar, Inc. was filed in S.D.N.Y. and the motion concerning RAINN was
 filed in D.D.C.

to Plaintiffs' inquiry regarding consent to transfer, Plaintiffs have indicated "Unknown and/or Undecided."

Objecting Entity or Person	District Where Compliance is Required	Consent to Jurisdiction of N.D. Cal.
Ballard Partners	D.D.C.	Yes
Brownstein Hyatt Farber Scheck LLP	D.D.C.	Yes
Cambridge Mobile Telematics	D.Mass.	No
Capitol Tax Partners	D.D.C.	No
Chambers Conlon & Hartwell	D.D.C.	Unknown and/or Undecided
Corrie Yakulic ³	D.D.C.	Yes
Doerr Group	D.D.C.	No
Federal Hill Group	D.D.C.	No
Franklin Square Group	D.D.C.	Unknown and/or Undecided
Hirease	C.D.Cal.	Unknown and/or Undecided
HireRight LLC	M.D.Tenn.	Unknown and/or Undecided
Mayer Brown LLP	D.D.C.	Yes
National Sexual Violence Resource Center (NSVRC)	M.D.Pa.	Unknown and/or Undecided
Nexar, Inc.	S.D.N.Y.	Motion to Transfer and Compel filed 05/31/2024
Rape Abuse and Incest National Network (RAINN)	D.D.C.	Motion to Transfer and Compel filed 05/31/2024
Rapid SOS	S.D.N.Y.	Unknown and/or Undecided
Summit Strategies and Government Affairs	D.D.C.	No
The Chertoff Group	D.D.C.	Yes
Tremont Strategies Group	D.Mass.	Unknown and/or Undecided
Ulman Public Policy & Federal Relations LLC	D.D.C.	Unknown and/or Undecided
Urban Institute	D.D.C.	No

The following chart lists the entities from whom objections have not been received and the district where compliance is required.

Subpoenaed Entity or Person	District Where Compliance is Required
Chambers Conlon & Hartwell	D.D.C.
Invariant	D.D.C.
RALIANCE	D.D.C.
Tai Ginsberg & Associates	D.D.C.

³ Plaintiff attorney Corrie Yakulic has not filed objections but has not provided responses. Instead, Ms. Yakulic is waiting for court authorization to comply with the subpoena before providing documents.

The following chart lists the entities located in the Northern District of California and whether they will be included in the first set of briefing, as agreed upon by the Parties.

Subpoenaed Entity or Person	Selected for First Round of Briefing
7x7 Experience	Yes
Checkr, Inc.	Yes
Lyft	Yes
Nauto, Inc.	No
Sara Peters	Yes

At this time, no entity has filed a Motion to Quash, but in accordance with the Court's Order, Plaintiffs will file Notices on the docket to the extent that changes.

1 Dated: June 7, 2024

Respectfully submitted,

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